

DELTA PROTECTION COMMISSION

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October 28, 1996

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Lester Snow
CALFED
1416 Ninth Street
Sacramento, CA 95814

Subject: Delta Protection Commission Concerns Regarding the CALFED
Levee Program

Dear Mr. Snow:

As Phase I of the CALFED ends, I think it timely to reiterate the Delta Protection Commission's adopted policies as they apply to the CALFED levee program. These comments have not been reviewed by the entire Commission, but they are based on the Commission's "Land Use and Resource Management Plan for the Primary Zone of the Delta" (Plan), adopted February 23, 1995. The Commission's areas of concern and interest primarily focus on land uses in the Delta, not issues associated with water quality.

The alternatives developed by the CALFED staff should consider and reflect the policies in the Commission's adopted Plan. The Plan was adopted unanimously by the 19-member Commission made up of representatives of Delta cities, Delta Counties, Reclamation Districts, and six State agencies with interests in the Delta. This unique group considered a wide range of topics, issues, and information in developing the Plan and received input from many Delta residents, land owners, and others with interest in the Delta.

The Phase I Final Report, September 1996, states on page 20 "Delta islands will be prioritized, a strategic plan devised, and stable funding sources identified...Among the criteria to prioritize islands will be protection of public infrastructure (e.g. pipelines and railroads); protection of private infrastructure (e.g. marinas); maintenance of water quality for all users; and preservation of cultural, recreational, and natural resources...Finally, it might prove prohibitively expensive to bring the entire Delta up to a common high level of flood protection." These statements have not been recommended by the Bay-Delta Advisory Council (BDAC) as policy, nor have they been approved or adopted by CALFED, nor any of the signatories to the CALFED agreement.

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The Commission has already sent you two letters outlining the Commission's adopted position that all the Delta levees should eventually be brought to a more stable and more reliable standard, particularly the Corps PL-99 agricultural standard. The Commission notes that all, except four, of the Delta islands already meet the Hazard Mitigation Plan standard, which was required through State-federal agreement after the devastating floods of the early 1980's.

The Commission is also concerned about the cost of raising all the levees to the PL-99 standard. In fact, we proposed starting a search of what existing information which has been developed to address that issue. CALFED was not interested in participating in developing that information. Perhaps CALFED would now be interested in developing an estimate, rather than including the unclear and unsubstantiated language now in the Phase I Final Report. (See page 20 "it might be prohibitively expensive to bring the entire Delta up to a common level of flood protection".)

The Commission has adopted a policy that Delta levees height and cross-sections be maintained "at a minimum as stipulated in the Flood Hazard Mitigation Plan guidelines, and set longer term goals of meeting PL-99 Standards" (Levees Policy P-2, p. 43).

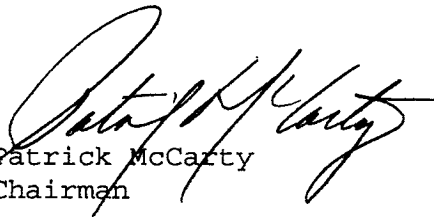
The Commission acknowledges the existing prioritization program under SB 34 that calls for a special funding program for the eight western islands. While the Commission agrees that some islands protect infrastructure and other built elements, the Commission's discussions have reflected support for maintaining all the islands' levees. The Commissioners recognize the values of each of the Delta islands and see the region as an inter-related whole, where each island is part of the overall system, each providing an unique aspect.

In summary, the CALFED policy on levee maintenance and enhancement should include protection of the regional integrity of the levees and, based on specific cost estimates, develop a plan for implementation of levee maintenance and enhancement over time which can be funded under existing or proposed funding sources. This new policy should be presented to BDAC for review, and then forwarded to CALFED for adoption as a program policy.

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Please feel free to call me or the Commission's staff, Margit Aramburu, if you have any questions about this letter.

Sincerely,


Patrick McCarty
Chairman

cc: Delta Protection Commission